

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Kevin Lavon Giles

Case: 2:21-mj-30257

Assigned To : Unassigned

Date : 5/27/2021

USA V SEALED (KCM)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 1 to May 25, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 1591

Sex trafficking of a minor and sex trafficking by force, fraud, and coercion

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 27, 2021

City and state: Flint, Michigan



Complainant's signature
Christopher Szczygiel, Special Agent (FBI)

Printed name and title



Judge's signature
Hon. Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

INTRODUCTION

I, Christopher Szczygiel, being duly sworn, depose and state the following:

1. I am employed by the Federal Bureau of Investigation as a Special Agent and have been for approximately thirteen years. I currently work on the Southeast Michigan Trafficking and Exploitation Crimes (SEMTEC) Task Force. I have experience investigating child sexual exploitation and human trafficking crimes and have also been trained specifically on these types of investigations. I have consulted with numerous other SEMTEC agents, including those that have worked on human trafficking investigations for many years.
2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Kevin Lavon Giles (DOB XX/XX/1966) for violations of 18 U.S.C. § 1591 (sex trafficking of a minor, and sex trafficking using force, fraud, and coercion).
3. The facts and information contained in this affidavit are based on my own investigation which includes information conveyed to me by other law enforcement officials, other cooperating individuals, my personal experience and training with related offense, and my personal knowledge and observations during the course of this investigation.

4. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Kevin Lavon Giles.

PROBABLE CAUSE

5. On or about April 16, 2021, I received information that a 17-year-old female (Minor Victim One or MV-1) had run away from home and was living with Giles at his residence on Pembroke in Detroit, Michigan. The information I received indicated that a second minor, a 16-year-old girl (Minor Victim Two or MV-2), was also living at the residence with Giles, that both MV-1 and MV-2 were engaged in commercial sex acts at Giles's residence, and that Giles was taking all of the proceeds from MV-1's and MV-2's commercial sex acts. The tipster provided a cell phone number for MV-1, (XXX) XXX-9605.

6. On or about April 21 and 22, 2021, I spoke with a Michigan Department of Health and Human Services Child Protective Services worker (CPS worker) assigned to MV-1. The CPS worker had spoken with MV-1, MV-2, and Giles, and informed me about their conversations. Specifically, she informed me of the following:

- a. On or about April 21, 2021, the CPS worker spoke with MV-1, who said that she met Giles at a club sometime in February 2021. Giles told MV-1 that she and her infant son could come live at his home for free. A short time after she moved in with Giles, Giles attempted to have sex with MV-1. When MV-1 refused, Giles told her she would have to start paying rent. In order to pay rent, MV-1 started engaging in commercial sex acts inside Giles's residence. Initially, Giles would take \$20 of the proceeds from MV-1's commercial sex acts, but he eventually began taking all of MV-1's proceeds. On or about April 9, 2021, Giles told MV-1 that she would have to pay more rent; when she refused, he kicked her out of his residence.
- b. On or about April 20, 2021, the CPS worker interviewed MV-2, who stated that her cell phone number was (XXX) XXX-0790. MV-2 stated that she had spent one night at Giles's residence to attend her "fake birthday party" on or about April 16, 2021. While at the residence, MV-2 observed MV-1 and a "lot of girls" engaging in commercial sex acts. MV-2 also saw several security cameras at Giles's residence, specifically in the living room, Giles's bedroom, and outside the house. According to MV-2, Giles used these cameras to

watch customers or “Johns” engaging in commercial sex acts with MV-1 and others.

7. I searched the internet for advertisements for MV-1’s and MV-2’s cell phone numbers. I located commercial sex advertisements for both MV-1 and MV-2 on the website megapersonals.com. The advertisements included photographs and videos of both MV-1 and MV-2. Some of the photographs of MV-1 depict her standing in front of a pole in a living room. One of the advertisements for MV-2 was posted on April 5, 2021 and included the title, “its my birthday [smile emoji] cum \$ee me.”

8. On or about April 24, 2021, SEMTEC members and I executed a search warrant issued by the State of Michigan Third Circuit Court at Giles’ residence. Upon entering the residence, we encountered Giles, Adult Victim One (AV-1), and AV-1’s one-year-old child.

9. Inside the residence, I observed a pole inside the living room that I recognized as similar to the pole depicted in the commercial sex advertisements for MV-1. I also interviewed Giles, who denied knowing about any commercial sex activity inside his residence. He acknowledged that MV-1 and MV-2 had lived there briefly. According to Giles, he had heard that MV-1 and MV-2 were performing commercial sex acts and confronted them about it. MV-1 and MV-2 moved out shortly after.

10. During the execution of the search warrant, SEMTEC members seized cell phones belonging to Giles and AV-1, as well as two Wyze Security Cameras located in Giles's kitchen and bedroom.

11. Subsequently, a forensic review of Giles's cellphone revealed numerous text messages between Giles and both MV-1 and MV-2. I reviewed these messages and recognized several containing language consistent with commercial sex trafficking, including the following text messages between MV-1 and Giles:

Date	Time	From	To	Message
03/18/21	9:13PM	Giles	MV-1	Don't have anyone in my house if it's not about business no one up stairs I'm watching the cameras
03/18/21	9:14PM	Giles	MV-1	Ok I'm about to have ones posted outside to show you how I roll
03/18/21	9:36PM	MV-1	Giles	Got. Client
03/18/21	9:41PM	Giles	MV-1	Ok watching
03/24/21	2:59AM	MV-1	Giles	I do wanna work
03/24/21	3:02AM	Giles	MV-1	I'm on my way
03/24/21	3:24AM	Giles	MV-1	Just wait
03/24/21	5:40AM	MV-1	Giles	I got someone here
03/24/21	5:40AM	Giles	MV-1	Ok bring the baby up
03/24/21	5:53AM	MV-1	Giles	Post me again

03/24/21	5:56AM	Giles	MV-1	Come here
03/24/21	8:47AM	MV-1	Giles	I got another one here
03/24/21	9:05AM	Giles	MV-1	Come her [sic] now
03/24/21	11:17AM	MV-1	Giles	I need a condom
03/24/21	11:20AM	Giles	MV-1	On the stairs
03/24/21	12:23PM	MV-1	Giles	I got someone
03/24/21	12:25PM	MV-1	Giles	Rubber
03/27/21	1:34AM	Giles	MV-1	My money from yesterday and today 65 from yesterday 75 and 30 from today
03/27/21	1:35AM	MV-1	Giles	I thought you said it was off the phone 150?
03/27/21	1:36AM	Giles	MV-1	U don't want to post anymore
03/27/21	1:36AM	MV-1	Giles	I do
03/27/21	1:36AM	Giles	MV-1	So pay up
03/27/21	1:36AM	MV-1	Giles	So I'm working tonight post me
03/27/21	1:38AM	MV-1	Giles	What about that 40
03/27/21	1:39AM	Giles	MV-1	I post you

12. In addition, I reviewed text messages between MV-2 and Giles and recognized several containing language consistent with commercial sex trafficking, including the following:

Date	Time	From	To	Message
04/05/21	3:10PM	MV-2	Giles	Child rapist. Touching us in our sleep. You going to prison.
04/05/21	3:11PM	Giles	MV-2	Don't know what you talking about u out here setting nigga up to be rob
04/05/21	3:11PM	MV-2	Giles	Tricking 16 and 17 year olds out yo house. You sad.

13. As set forth above, when SEMTEC members executed the search warrant at Giles's residence on April 24, 2021, we encountered AV-1 and AV-1's one-year-old child inside the residence.

14. On or about April 26, 2021, I returned to Giles's residence to return several items seized during the execution of the search warrant. When I knocked at the front door, AV-1 opened the door, but left the glass storm door closed. AV-1 stated that Giles was at work and she was at the residence alone with her child. I asked AV-1 to open the storm door so that the items could be handed to her, but she told me that she could not because the door was locked by Giles and she did not have a key. I asked if the side door was also locked in the same manner, and AV-1 responded yes.

15. On or about May 20, 2021, I received a phone call from AV-1. AV-1 told me she was becoming scared of Giles and needed immediate assistance getting herself and her child out of his residence. AV-1 further stated that Giles was trafficking her and that she would most likely be forced to engage in commercial sex acts that night if she was not able to escape the residence. During the phone call, AV-1 was whispering and appeared to be crying and in severe distress. AV-1 called me a second time and stated that Giles had threatened to take her child away and was calling friends over to his house to help him keep her there.

16. That same night, several SEMTEC members and I went to Giles's residence to recover AV-1 and her child. When we arrived, I saw AV-1 carrying her child and sprinting away from the house into my car. SEMTEC members then collected AV-1's personal belongings from the front porch of the residence while Giles stood by the front door observing.

17. SEMTEC members and I brought AV-1 to the Detroit Police Department Tenth Precinct to interview her there. During the interview, AV-1 stated the following:

- a. AV-1 first met Giles at a club shortly after she gave birth to her child.

AV-1 told Giles that she was homeless, and Giles told her that she and her child could come live at his house for free.

- b. AV-1 and her child then moved in with Giles, and shortly after AV-1 began engaging in commercial sex. Initially, Giles would let her keep all of the proceeds, which AV-1 believed was done to build her trust. Eventually Giles began taking all of her money, giving her a small allowance.
- c. Giles would post AV-1's online sex advertisements using his phone. In addition, he would be the one to communicate with the customers, *i.e.*, "Johns," and set all of the prices to be charged for the sex acts.
- d. Giles had cameras set up around the house so that he could watch AV-1 engage in commercial sex. Giles would watch the cameras to ensure that AV-1 was collecting the correct amount of money from the Johns.
- e. AV-1 has a severe illness requiring weekly treatment. However, while she was living with him, Giles would not let her go to her treatments. AV-1 was also prescribed medicine for her pain, but Giles would keep the pills and make her buy them back from him, one pill at a time.
- f. Giles forced AV-1 to engage in commercial sex acts on a daily basis up until April 24, 2021, when SEMTEC executed the search warrant at his residence. Following the search warrant, Giles became nervous of law enforcement and would have AV-1 engage in commercial sex only on the weekends. In addition, after the search warrant was

executed, Giles replaced all of the seized security cameras with new ones.

18. As set forth above, Giles's cell phone was recovered during the execution of the search warrant at his residence on April 24, 2021, and a forensic review of that phone revealed text messages between Giles and AV-1. I subsequently reviewed those text messages and observed several that contained language consistent with sex trafficking, including the following:

Date	Time	From	To	Message
04/22/21	4:59AM	Giles	AV-1	Did he come in yet
04/22/21	5:27AM	AV-1	Giles	Yes
04/22/21	5:28AM	Giles	AV-1	Where your money at.
04/22/21	6:20AM	Giles	AV-1	Money to be made.
04/22/21	6:20AM	AV-1	Giles	I'm posting boo. Mfs playing. It's just one of those nights.


19. On or about April 21, 2021, I conducted a criminal history search on Giles. Giles has the following convictions from Michigan: a 1984 conviction for Unarmed Robbery (750.530) from the Third Circuit Court in Detroit; a 1986 conviction for First Degree Criminal Sexual Conduct (750.520B1D) from the Third Circuit Court in Detroit; and a 2016 conviction for Felony Fraudulent

Activities (445.67) from the Sixth Circuit Court in Pontiac. Giles is also currently registered on the State of Michigan Sex Offender Registry.

CONCLUSION


20. For the reasons set forth above, I believe probable cause exists that Kevin Lavon Giles violated 18 U.S.C. § 1591 (sex trafficking of a minor and sex trafficking by force, fraud, and coercion).

Respectfully submitted,



Christopher Szczygiel
Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Curtis Ivy, Jr.
United States Magistrate Judge

Dated: May 27, 2021